

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Kareem A. Tannous,	:	
	:	Civil Action
Plaintiff,	:	
v.	:	No. 2:23-cv-01115-GAM
	:	
Cabrini University, The Jewish Federation	:	
of Greater Philadelphia, and	:	
STOPANTISEMITISM.ORG,	:	
	:	
Defendants.	:	

**DEFENDANT’S MOTION FOR JUDGMENT ON THE PLEADINGS, OR IN THE  
ALTERNATIVE MOTION FOR SUMMARY JUDGMENT, OR IN THE  
ALTERNATIVE MOTION FOR LIMITED FACT DISCOVERY**

Defendant Cabrini University (“Cabrini”) by and through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 12(c), hereby files this Motion for Judgment on the Pleadings, or in the alternative Motion for Summary Judgment as to Plaintiff’s remaining claims. Absent that relief, Cabrini seeks relief from this Court in the form of an order initially limiting fact discovery to facts relating to the authenticity of certain relevant documents (specifically: Plaintiff’s Employment Contract (Dkt. 32-4), Cabrini’s Faculty Handbook (Dkt. 32-2) and Social Media Addendum (Dkt. 32-3)) attached to Cabrini’s Answer which are at issue in Count IV alleging breach of contract. Cabrini incorporates its Memorandum in Support of its Motion by reference as if fully set forth herein.

Dated: December 1, 2023

Respectfully submitted,

/s/ Marjorie Obod

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